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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

LYNK MEDIA LLC,

Plaintiff,

Case No.: 1:25-cv-02050-JSR

v.

RECOUNT MEDIA INC,

Defendant.

PROPOSED DEFAULT JUDGMENT

Upon consideration of the motion for default judgment filed by the plaintiff, Lynk Media LLC ("Plaintiff") under Rule 55.2(b)(2) of the Federal Rules of Civil Procedure and Local Rule 55.2; and the declaration of Plaintiff's counsel, Dina Nouhian, Esq., and exhibits attached thereto, the declaration of Oliva Fedun and exhibits attached thereto, the Memorandum of Law, the Statement of Damages, and upon all prior papers and proceedings filed herein, it is hereby:

ORDERED, ADJUDGED and **DECREED** that:

- 1. Default judgment as to liability for copyright infringement under 17 U.S.C. § 501 be entered against defendant Recount Media Inc. ("Defendant");
- 2. Defendant is to pay the sum of \$30,000.00 in statutory damages pursuant to 17 U.S.C. § 504(c) for direct copyright infringement;
- 3. Defendant is to pay \$8,337.00 in attorneys' fees and \$460.00 in costs pursuant to 17 U.S.C. § 505;
- 4. Defendant is to pay post-judgment interest pursuant to 28 U.S.C.A. § 1961; and
- 5. The Court shall retain jurisdiction over any matter pertaining to this judgment

SO ORDERED

Hon. Jed S. Rakoff

United States District Judge